

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Classification Schedule Change  
(Priority Mail)

Docket No. MC2011-26

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE NOTICE OF MINOR CLASSIFICATION  
CHANGES CONCERNING PRIORITY MAIL PACKAGING

(August 4, 2011)

The Public Representative hereby provides comments pursuant to Order No. 777.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on the Postal Service's notice of minor classification changes concerning Priority Mail Flat Rate Boxes and Flat Rate Envelopes.<sup>2</sup>

The Public Representative recommends Commission approval of the proposed classification changes.

**COMMENTS**

The first classification change would clarify that the size limitations for each type of Flat Rate Box will be based on cube size rather than specific, discrete dimensions. USPS Notice at 1. More specifically, the classification would establish "approximately" 1/2, 1/3, and 1/20 cubic feet for the Large, Medium, and Small box types, respectively. Flat Rate Boxes are currently available for retail customer use in the following dimensions:<sup>3</sup>

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<sup>1</sup> PRC Order 777, Notice of Classification Changes, July 28, 2011.

<sup>2</sup> Notice of Minor Classification Changes, July 26, 2011 (herein "USPS Notice").

<sup>3</sup> Currently, Commercial Plus customers using Regional Rate Box A and Regional Rate Box B also have two Flat Rate Box sizes available, respectively, with differing outside dimensions.

Large: 12.25 x 12.25 x 6.0 or 11.875 x 3.125 x 24.0625 inches

Medium: 11.875 x 3.375 x 13.625 or 11.0 x 8.5 x 5.5 inches

Small: 8.625 x 5.375 x 1.625 inches

Another classification change establishes a range for the dimensions of the three available Flat Rate Envelope types: Regular, Padded, and Legal. The proposed dimensional range for all Flat Rate Envelope types is 5 x 10 inches to 9.5 x 15 inches. Flat Rate Envelopes, like Flat Rate Boxes, are currently described in discrete dimensions:

Regular: 9.5 x 12.5 inches

Padded: 10.0 x 13.0 inches

Legal: 9.5 x 15.0 inches

The Flat Rate Box classification change has the potential to increase customer packaging options. In theory, there are an infinite number of boxes with differing dimensions that could all have the same cube. As identified above, for the Large type Flat Rate Box, there are two box sizes, both of which are slightly more than  $\frac{1}{2}$  cubic foot. Similarly, there are two box sizes for the Medium type, and one for the Small type. Other sizes can be imagined, including tubes and triangle-shaped packaging, all of which could have a volume of "approximately"  $\frac{1}{2}$ ,  $\frac{1}{3}$  and  $\frac{1}{20}$  cubic foot, respectively. The possibility of many Flat Rate Box sizes at each specified cubic volume would readily satisfy virtually any customer flat rate packaging need.

In practice, the Postal Service can be expected to offer only a limited number of box sizes. To the extent that the Postal Service offers retail customers a larger number of box sizes than currently, with different dimensions at each cubic volume, some inefficiencies maybe introduced in processing and transportation. The current limited number of dimensional boxes for each box type likely increases the Postal Service's ability to create efficient pallets and completely utilize the cube of purchased transportation. In this regard, the FedEx day turn purchased transportation contract for

Priority Mail uses cubic feet for costing.<sup>4</sup> A larger number of boxes with different dimensions at each cubic volume may make more difficult the efficient utilization of pallets and purchased transportation.

The Flat Rate Envelope classification change also has the potential to permit varied sizes for the Regular, Padded and Legal envelopes and thereby increase the number packaging options for customers.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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<sup>4</sup> Docket No. ACR2010, Library Reference USPS-LR-32, Excel file: CS14.xls.